

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LISSANDER DONES,

Plaintiff,

DECLARATION OF
CAROLYN WALKER-
DIALLO

-against-

THE CITY OF NEW YORK, et al.,

07 Civ. 3085 (SAS) (GWG)

Defendants.

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CAROLYN WALKER-DIALLO, declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced matter.

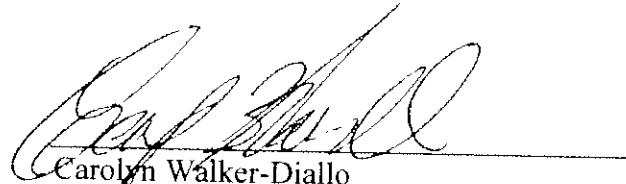
2. I submit this declaration in support of Defendants' motion for summary judgment pursuant to Rule 56(b) of the Federal Rules of Civil Procedure, to place before the Court excerpts from Plaintiff's deposition testimony and public documents before the Court. These materials are relied upon and cited in Defendants' Local Civil Rule 56.1 Statement of Undisputed Material Facts and Defendants' Memorandum of Law in Support of Their Motion for Summary Judgment. The materials annexed hereto are:

1. Annexed hereto as Exhibit "1" is a copy of plaintiff's complaint dated April 10, 2005.
2. Annexed hereto as Exhibit "2" is a copy of portions of plaintiff's deposition testimony dated February 20, 2008.
3. Annexed hereto as Exhibit "3" is a copy of the transcript for the status conference on March 3, 2008.

4. Annexed hereto as Exhibit "4" is a copy of a New York Times Article titled "Detective Fired in Aftermath of New York Police Inquiry," dated September 24, 2004.
5. Annexed hereto as Exhibit "5" is a copy of a New York Times Article titled "Ex-Detective Turned Drug Dealer Gets 6-Year Prison Sentence," dated October 6, 2006.
6. Annexed hereto as Exhibit "6" is a copy of a New York Times Article titled "Ex-Detective is Given 7-Year Prison Term, Ending Investigation in Drug Money Case," dated October 14, 2006.
7. Annexed hereto as Exhibit "7" is a copy of the Judgment in the matter United States of America v. Julio Vasquez, CR04-00182, dated November 7, 2006.
8. Annexed hereto as Exhibit "8" is a copy of the Judgment in the matter United States of America v. Thomas Rachko, CR04-00182, dated October 31, 2006.
9. Annexed hereto as Exhibit "9" is a copy of the Docket Sheet in the matter, United States of America v. Julio Vasquez, CR04-00182, printed April 8, 2008.
10. Annexed hereto as Exhibit "10" is a copy of the Docket Sheet in the matter United States of America v. Thomas Rachko, CR04-00182, printed April 8, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 15, 2008



Carolyn Walker-Diallo
Assistant Corporation Counsel